

COMMISSIONERS
Robert "Bob" Burns - Chairman
Boyd Dunn
Sandra D. Kennedy
Justin Olson
Lea Márquez Peterson



Boyd Dunn
COMMISSIONER
(602) 542-3935 OFFICE
Dunn-Web@azcc.gov

ARIZONA CORPORATION COMMISSION
OFFICE OF COMMISSIONER BOYD DUNN

August 4, 2020

Docket Control
Arizona Corporation Commission
1200 W. Washington St.
Phoenix, AZ 85007

Re: In the matter of possible modifications to the Arizona Corporation Commission's Energy RulesRU-00000A-18-0284.

Dear Mr. Chairman and my fellow Commissioners,

I am writing today to comment on the process for energy rules moving forward. After the abrupt ending to the Special Open Meeting last week, I feel it is important that we stay with the process all five Commissioners agreed to earlier this summer.

The process we agreed to included consideration of Staff's most recent draft of the energy rules and all associated Commissioner amendments. This is not a novel concept. In fact, it is the process followed in every other case. Having conducted multiple workshops, hearing from various stakeholders, and reviewing multiple iterations of drafts provided by Staff, it is reasonable to start with Staff's latest draft. With amendments to Staff's draft proposed by three Commissioners, I think it is imperative that we start with those amendments before moving on to something that disregards the last two years of work put in by Staff, the stakeholders, and this Commission.

At last Thursday's Special Open Meeting, I appreciated all the comments that we received from the stakeholders and public. It was unfortunate that the meeting was abruptly ended just before the Commission could do any of the substantive work that we need to do.

The energy rules are a historic opportunity for us to make meaningful change and shape Arizona's energy future. Staff's latest draft creates two energy standards that require utilities to be 100% clean by 2050, and 50% renewable by 2035. It reimagines resource planning and makes substantive changes to how utilities procure energy. It also provides a carveout to encourage storage and peak response. Adopting Staff's draft without any amendment would put Arizona in a leadership role in the west on clean energy. The various amendments proposed by Commissioners to Staff's draft seemingly strengthen many of these concepts discussed above.

I urge this Commission to not let this opportunity pass us by. We cannot let politics and gamesmanship get in the way of making Arizona a leader in clean and renewable energy. Staff's draft rules and all proposed amendments must be considered and voted on so we can move Arizona into an exciting and responsible energy future.

Sincerely,



Boyd Dunn
Commissioner

